

EXHIBIT 1

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

Timekeeper ↑	Entry Date	Customary Rate	Time in hours decimal	Total Amount	Work Description
Jeremiah Frei-Pearson	11/11/2019	\$950.00	0.01	\$9.50	DISCUSS POTENTIAL CASE WITH CLIENT
Partner, Stanford Law 2003	5/15/2020	\$950.00	1.5	\$1,425.00	REVIEW MOTION TO DISMISS AND DISCUSS SAME WITH M. POTASHNICK
	5/18/2020	\$950.00	1.7	\$1,615.00	REVIEW DRAFT OF MOTION TO DISMISS OPPOSITION; RESEARCH DISCRETE LEGAL ISSUES
	5/19/2020	\$950.00	1.5	\$1,425.00	REVIEW DRAFTS OF MOTION TO DISMISS
	8/6/2020	\$950.00	0.4	\$380.00	DISCUSS MOTION TO COMPEL
	8/7/2020	\$950.00	1.1	\$1,045.00	REVIEW AND REVISE DRAFT PROTECTIVE ORDER; DISCUSS SAME W/M. POTASHNICK; COMMUNICATE WITH DEFENDANTS' COUNSEL RE SAME
	8/11/2020	\$950.00	0.5	\$475.00	EMAILS WITH DEFENDANTS REGARDING DISCOVERY
	8/13/2020	\$950.00	1.4	\$1,330.00	REVISE AND EDIT DRAFT LETTER TO COURT REGARDING DISCOVERY
	8/14/2020	\$950.00	0.9	\$855.00	REVIEW AND FINAL EDITS ON DISCOVERY LETTER
	12/2/2020	\$950.00	0.7	\$665.00	EDIT DRAFT LETTER OPPOSITION REGARDING MOTION TO DISMISS
	12/3/2020	\$950.00	0.4	\$380.00	REVIEW LETTER TO THE COURT REGARDING MOTION TO DISMISS
	12/4/2020	\$950.00	0.2	\$190.00	REVIEW AND EDIT JOINT LETTER TO J. MOSES
	12/8/2020	\$950.00	0.2	\$190.00	REVIEW AND EDIT SUMMARY OF CONFERRAL CALL
	12/8/2020	\$950.00	0.6	\$570.00	INTERNAL STRATEGY REGARDING DEFENDANTS' REFUSAL TO PROVIDE ESI AND POTENTIAL NECESSITY OF A DEPOSITION
	12/8/2020	\$950.00	1	\$950.00	MEET AND CONFER REGARDING ELECTRONIC DISCOVERY
	12/9/2020	\$950.00	0.5	\$475.00	EDIT DRAFT 30(B)(6) DEPO NOTICE
	12/9/2020	\$950.00	0.5	\$475.00	CALL WITH JUDGE MOSES
	12/9/2020	\$950.00	0.2	\$190.00	AFTER PARTS AUTHORITY CLAIMED THAT IT PRODUCED MANY EMAILS IN ARBITRATION, REVIEWED AND CONFERRED REGARDING PARTS AUTHORITY'S ACTUAL PRODUCTION OF EMAILS IN ARBITRATION - WHICH TOTALLED LESS THAN 6 IN AN INDIVIDUAL CASE
	12/10/2020	\$950.00	0.6	\$570.00	REVIEW DATA DEPOSITIONS OUTLINE, COMMENTS, COMMUNICATIONS, AND STRATEGIZE REGARDING SAME
	12/14/2020	\$950.00	0.3	\$285.00	COMMUNICATE WITH DEFENDANTS REGARDING DISCOVERY AND SETTLEMENT
	12/18/2020	\$950.00	0.5	\$475.00	REVIEW DEFENDANTS' ESI DEPO OBJECTIONS AND DISCUSS SAME INTERNALLY
	12/23/2020	\$950.00	1.3	\$1,235.00	REVISE LETTER REGARDING 30(B)(6) DEPOSITIONS; DISCUSS SAME WITH TEAM
	12/24/2020	\$950.00	0.4	\$380.00	REVISE LETTER REGARDING 30(B)(6) DEPOSITION
	12/24/2020	\$950.00	0.3	\$285.00	CONSIDER POTENTIAL MEDIATORS
	1/4/2021	\$950.00	0.7	\$665.00	MULTIPLE COMMUNICATIONS WITH CO-COUNSEL AND CLIENTS REGARDING POSSIBLE MEDIATION
	1/5/2021	\$950.00	0.2	\$190.00	FOLLOWUP WITH DEFENDANTS REGARDING 30(B)(6) DEPOSITIONS
	1/6/2021	\$950.00	1.1	\$1,045.00	COMMUNICATIONS REGARDING 30(B)(6) DEPOSITION
	1/7/2021	\$950.00	0.2	\$190.00	MORE COMMUNICATIONS REGARDING 30(B)(6) DEPOS
	1/8/2021	\$950.00	0.2	\$190.00	COMMUNICATE WITH DEFENSE COUNSEL REGARDING UPCOMING MEDIATION

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1/13/2021	\$950.00	0.2	\$190.00	COMMUNICATE WITH MEDIATOR AND OPPOSING COUNSEL REGARDING MEDIATION
1/21/2021	\$950.00	0.2	\$190.00	COMMUNICATE INTERNALLY AND WITH DEFENSE COUNSEL REGARDING SCOPE OF MEDIATION
1/22/2021	\$950.00	0.4	\$380.00	PRE-MEDIATION CALL WITH J. MAAS AND COUNSEL
1/25/2021	\$950.00	0.4	\$380.00	MULTIPLE INTERNAL COMMUNICATIONS REGARDING COMMUNICATING OFFERS TO CLIENTS
1/26/2021	\$950.00	0.3	\$285.00	REVIEW CLIENT RECORDS; COMMUNICATE WITH DEFENSE COUNSEL REGARDING CLIENTS
1/27/2021	\$950.00	0.4	\$380.00	COMMUNICATE WITH ACW REGARDING MEDIATION STATEMENT; OUTLINE SAME
1/28/2021	\$950.00	3.5	\$3,325.00	REVIEW, EDIT AND FINALIZE MEDIATION STATEMENT; DISCUSS SAME
2/1/2021	\$950.00	0.4	\$380.00	PRE-MEDIATION CALL WITH JUDGE MAAS
2/1/2021	\$950.00	0.4	\$380.00	CALL WITH MEDIATOR
2/2/2021	\$950.00	5.4	\$5,130.00	MEDIATION
2/3/2021	\$950.00	0.9	\$855.00	TEAM MEETING REGARDING SETTLEMENT OFFERS
2/3/2021	\$950.00	1.1	\$1,045.00	DISCUSS VARIOUS OFFERS AND POTENTIAL RECOMMENDATIONS TO CLIENTS
2/4/2021	\$950.00	0.7	\$665.00	REVIEW AND EDIT DRAFT LETTER TO JUDGE MOSES
2/4/2021	\$950.00	0.2	\$190.00	NUMEROUS EMAILS REGARDING JOINT LETTER TO COURT; EDIT SAME
2/4/2021	\$950.00	0.9	\$855.00	DISCUSS VARIOUS OFFERS AND RECOMMENDATIONS TO CLIENTS
2/8/2021	\$950.00	0.4	\$380.00	INTERNAL COMMUNICATIONS REGARDING NARROWING 30(B)(6) REQUESTS AND RESPONDING TO DEFENDANTS' DISCOVERY REQUESTS
2/8/2021	\$950.00	0.8	\$760.00	STATUS CONFERENCE
2/8/2021	\$950.00	0.3	\$285.00	PREPARE FOR STATUS CONFERENCE
2/9/2021	\$950.00	1.6	\$1,520.00	DEAL WITH SETTLEMENT COMMUNICATIONS WITH CLIENTS
2/9/2021	\$950.00	1.2	\$1,140.00	MEET AND CONFER REGARDING DEPOSITIONS
2/15/2021	\$950.00	1.8	\$1,710.00	EDIT MOTION TO DISMISS OPPOSITION
2/17/2021	\$950.00	0.4	\$380.00	COMMUNICATE WITH DEFENDANTS REGARDING VARIOUS SETTLEMENT OPTIONS
2/17/2021	\$950.00	0.3	\$285.00	DISCUSS CASE WITH R. MARTIN
2/18/2021	\$950.00	0.9	\$855.00	CONFER REGARDING DEPOSITIONS AND WRITTEN DISCOVERY
2/23/2021	\$950.00	0.8	\$760.00	SETTLEMENT DISCUSSIONS
2/26/2021	\$950.00	0.8	\$760.00	MEET AND CONFER WITH DEFENDANTS
2/27/2021	\$950.00	0.3	\$285.00	DRAFT LETTER TO MAGISTRATE FOR SHARING WITH DEFENDANTS
3/3/2021	\$950.00	0.4	\$380.00	ANALYZE VARIOUS SETTLEMENT OFFERS AND DISCUSS CONVEYING SAME TO CLIENTS WITH ADVICE.
3/4/2021	\$950.00	1.3	\$1,235.00	COMMUNICATIONS REGARDING WHETHER TAX FILINGS ARE DISCOVERABLE; RESEARCH SAME; EMAIL DEFENDANTS REGARDING SAME; EMAIL DEFENDANTS REGARDING NUMEROUS DISCOVERY ACTIONS.
3/4/2021	\$950.00	0.7	\$665.00	CALL REGARDING DISCOVERY
3/8/2021	\$950.00	0.5	\$475.00	COMMUNICATIONS REGARDING SETTLEMENT OFFERS TO OPTINS AND DISCUSSIONS WITH CLIENTS REGARDING SAME

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	3/11/2021	\$950.00	0.9	\$855.00	COMMUNICATIONS REGARDING DEPOSITIONS
	3/18/2021	\$950.00	1.1	\$1,045.00	MEET AND CONFER REGARDING DISCOVERY
	3/19/2021	\$950.00	0.8	\$760.00	COMMUNICATIONS WITH OPTINS RE POTENTIAL SETTLEMENTS
	3/25/2021	\$950.00	1.1	\$1,045.00	DRAFT AND EDIT MEET AND CONFER EMAIL
	3/26/2021	\$950.00	0.7	\$665.00	COMMUNICATE INTERNALLY REGARDING DISCOVERY RESPONSES AND CLIENT STATEMENTS
	11/2/2021	\$950.00	0.5	\$475.00	FOLLOW-UP REGARDING SEARCH TERM RESULTS
	11/3/2021	\$950.00	0.2	\$190.00	DISCUSS NEXT STEPS
	11/4/2021	\$950.00	0.7	\$665.00	COURT CONFERENCE WITH JUDGE MOSES
	11/8/2021	\$950.00	1.3	\$1,235.00	COMMUNICATIONS REGARDING SETTLEMENT AGREEMENT
	11/8/2021	\$950.00	0.4	\$380.00	REVIEW AND EDIT PROPOSED ESI PROTOCOL
	11/16/2021	\$950.00	1.3	\$1,235.00	CONSIDER SETTLEMENT DISTRIBUTIONS AND CONCERNS OF PLAINTIFFS
	11/17/2021	\$950.00	0.9	\$855.00	REVISE SETTLEMENT STRUCTURE
	11/18/2021	\$950.00	0.8	\$760.00	EDIT MEDIATION AGREEMENT
	11/23/2021	\$950.00	0.6	\$570.00	DISCUSS NEXT STEPS WITH A. WHITE
	12/8/2021	\$950.00	0.5	\$475.00	WORK ON SETTLEMENT AND CONSIDER ISSUES RE M. HEADD
	12/15/2021	\$950.00	0.5	\$475.00	WORK ON SETTLEMENT
	1/10/2022	\$950.00	0.4	\$380.00	EDIT PROPOSED CHEEKS LETTER
	1/17/2022	\$950.00	0.2	\$190.00	CALL WITH PLAINTIFF
	1/19/2022	\$950.00	0.6	\$570.00	EDIT CHEEKS LETTER
Bradley Silverman, Of Counsel, University of Pennsylvania	4/13/2021	\$675.00	2	\$1,350.00	DRAFT DISCOVERY DEMANDS
Andrew White, Associate, NYU Law 2015	11/5/2019	\$525.00	2.1	\$1,102.50	CONSIDERATION OF ISSUES RE TEMPORARY RESTRAINING ORDER; RESEARCH RE SAME; WORK ON SAME
	11/6/2019	\$525.00	1.8	\$945.00	CONSIDERATION OF ISSUES RE TEMPORARY RESTRAINING ORDER, COMPLAINT; WORK ON SAME
	11/6/2019	\$525.00	0.3	\$157.50	CONSIDERATION OF ISSUES RE NAMING DILIGENT AS DEFENDANT IN COMPLAINT
	11/11/2019	\$525.00	1.1	\$577.50	WORK ON FILINGS FOR TEMPORARY RESTRAINING ORDER
	11/12/2019	\$525.00	3.4	\$1,785.00	WORK ON MOTION FOR TEMPORARY RESTRAINING ORDER, ORDER TO SHOW CAUSE, COMPLAINT
	11/15/2019	\$525.00	3.5	\$1,837.50	WORK ON MOTION FOR TEMPORARY RESTRAINING ORDER AND RELATED FILINGS; CONSIDERATION OF ISSUES RE SAME
	11/17/2019	\$525.00	2.6	\$1,365.00	WORK ON TEMPORARY RESTRAINING ORDER MOTION
	11/19/2019	\$525.00	1.9	\$997.50	WORK ON COMPLAINT, TEMPORARY RESTRAINING ORDER; CONSIDERATION OF ISSUES RE SAME
	11/20/2019	\$525.00	1.1	\$577.50	WORK ON MOTION FOR TEMPORARY RESTRAINING ORDER
	11/22/2019	\$525.00	0.6	\$315.00	CALL TO COURT RE TEMPORARY RESTRAINING ORDER; CONSIDERATION OF ISSUES RE SAME

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12/4/2019	\$525.00	0.6	\$315.00	REVIEW AND ANALYZE DECLARATION OF M. GRULLAT; CONSIDERATION OF ISSUES RE SAME
12/5/2019	\$525.00	1.4	\$735.00	WORK ON DECLARATION OF M. GRULLAT; FILE CORRECTED VERSION OF SAME
12/11/2019	\$525.00	0.4	\$210.00	REVIEW AND ANALYZE DILIGENT'S PRE-MOTION LETTER RE MOTION TO DISMISS
12/12/2019	\$525.00	4.8	\$2,520.00	WORK ON REPLY BRIEF RE TEMPORARY RESTRAINING ORDER, PROPOSED AMENDED COMPLAINT
12/13/2019	\$525.00	1.9	\$997.50	WORK ON LETTER RESPONSE RE MOTION TO DISMISS; CONSIDERATION OF ISSUES RE AMENDED COMPLAINT
12/14/2019	\$525.00	3.4	\$1,785.00	WORK ON REPLY BRIEF RE TEMPORARY RESTRAINING ORDER
12/15/2019	\$525.00	6.2	\$3,255.00	WORK ON REPLY BRIEF RE TEMPORARY RESTRAINING ORDER, AMENDED COMPLAINTS, LETTER REQUEST TO FILE SAME
12/16/2019	\$525.00	1.2	\$630.00	WORK ON REPLY BRIEF RE TEMPORARY RESTRAINING ORDER AND ASSOCIATED FILINGS
12/17/2019	\$525.00	1.4	\$735.00	WORK ON DISCOVERY DEMANDS
12/19/2019	\$525.00	0.3	\$157.50	WORK ON FILING REPLY BRIEF
12/23/2019	\$525.00	0.8	\$420.00	REVIEW DISCOVERY DEMANDS; CONSIDERATION OF ISSUES RE SAME
12/24/2019	\$525.00	0.8	\$420.00	WORK ON DISCOVERY DEMANDS
12/26/2019	\$525.00	1.1	\$577.50	CONSIDERATION OF ISSUES RE AMENDED COMPLAINT; WORK ON SAME
12/27/2019	\$525.00	3.9	\$2,047.50	WORK ON AMENDED COMPLAINT; CONSIDERATION OF ISSUES RE SAME
12/30/2019	\$525.00	4.1	\$2,152.50	WORK ON AMENDED MASTER COMPLAINT; CONSIDERATION OF ISSUES RE STATES AND CLAIMS TO INCLUDE; CONSIDERATION OF ISSUES RE STIPULATION RE CLIENT-TO-CLIENT CONTACT
12/31/2019	\$525.00	3.6	\$1,890.00	WORK ON AMENDED COMPLAINT
1/2/2020	\$525.00	10.2	\$5,355.00	WORK ON AMENDED COMPLAINT; CALLS TO CLIENTS RE SAME
1/3/2020	\$525.00	9.8	\$5,145.00	WORK ON FIRST AMENDED COMPLAINT; FILE SAME
1/7/2020	\$525.00	1.4	\$735.00	REVIEW INFO ON PUTATIVE CLASS MEMBERS; CONSIDERATION OF ISSUES RE STIPULATION ON COMMUNICATIONS WITH REPRESENTED DRIVERS
1/8/2020	\$525.00	2.4	\$1,260.00	REVIEW COURT ORDER ON AMENDED COMPLAINT; WORK ON STIPULATION RE COMMUNICATIONS WITH CLIENTS; CONSIDERATION OF ISSUES RE SAME
1/9/2020	\$525.00	4.1	\$2,152.50	WORK ON STIPULATION RE ARBITRATION AGREEMENTS AND CONTACT WITH DRIVERS; CONSIDERATION OF ISSUES RE SAME; CONSIDERATION OF ISSUES RE ARBITRATIONS; REVIEW SUMMONSES FOR NEW DEFENDANTS
1/10/2020	\$525.00	2.7	\$1,417.50	WORK ON STIPULATION RE CONTACTS WITH DRIVERS; CONSIDERATION OF ISSUES RE SAME; CONSIDERATION OF ISSUES RE REQUESTING EXTENSION TO FILE SAME
1/12/2020	\$525.00	0.4	\$210.00	CONSIDERATION OF ISSUES RE STIPULATION RE ARBITRATION AGREEMENTS AND CONTACTS WITH REPRESENTED DRIVERS
1/13/2020	\$525.00	0.9	\$472.50	CONSIDERATION OF ISSUES RE STIPULATION ON DRIVER CONTACTS

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1/14/2020	\$525.00	4.8	\$2,520.00	CONSIDERATION OF ISSUES RE STIPULATION RE CONTACTS WITH DRIVERS; CALL WITH DEFENDANTS RE SAME; WORK ON LETTER TO COURT RE STATUS OF SAME
1/16/2020	\$525.00	1.1	\$577.50	CONSIDERATION OF ISSUES RE CLASS REPRESENTATIVES, ARBITRATION ISSUES
1/21/2020	\$525.00	1.4	\$735.00	CONSIDERATION OF ISSUES RE AMENDING COMPLAINT, CLASS REPRESENTATIVES, ARBITRATIONS
1/23/2020	\$525.00	1.1	\$577.50	WORK ON STIPULATION RE DIRECT CLIENT CONTACT; CONSIDERATION OF ISSUES RE CLASSES
2/3/2020	\$525.00	0.8	\$420.00	WORK ON LETTER RE AMENDED COMPLAINT
2/4/2020	\$525.00	0.3	\$157.50	WORK ON LETTER TO COURT; CONSIDERATION OF ISSUES RE NAMED PLAINTIFFS
2/10/2020	\$525.00	2.2	\$1,155.00	WORK ON OPPOSITION TO MOTION TO STAY DISCOVERY
2/11/2020	\$525.00	6.1	\$3,202.50	WORK ON OPPOSITION TO DISCOVERY STAY
2/13/2020	\$525.00	2.1	\$1,102.50	PREPARE FOR CONFERENCE CALL WITH COURT; CONSIDERATION OF ISSUES RE NAMED PLAINTIFFS
2/14/2020	\$525.00	1	\$945.00	CALL WITH COURT; PREPARE FOR SAME; CONSIDERATION OF ISSUES RE SAME
2/21/2020	\$525.00	2.3	\$1,207.50	REVIEW CORRESPONDENCE WITH DEFENDANTS RE ARBITRATION AGREEMENTS; CONSIDERATION OF ISSUES RE ARBITRATIONS
2/26/2020	\$525.00	0.2	\$105.00	REVIEW PROCESS SERVER CHARGES AND APPROVE SAME
3/3/2020	\$525.00	0.6	\$315.00	CONFER WITH CLIENTS RE ADDITIONAL INFO REQUESTED BY DEFENDANTS; EMAIL SAME TO DEFENDANTS
3/4/2020	\$525.00	2.7	\$1,417.50	WORK ON INITIAL DISCLOSURES
3/5/2020	\$525.00	4.7	\$2,467.50	WORK ON INITIAL DISCLOSURES
3/6/2020	\$525.00	1.2	\$630.00	WORK ON INITIAL DISCLOSURES; CONSIDERATION OF ISSUES RE SAME
3/12/2020	\$525.00	2.4	\$1,260.00	CONSIDERATION OF ISSUES RE AMENDED COMPLAINT; RESEARCH RE SAME
3/18/2020	\$525.00	3.1	\$1,627.50	CALL TO POTENTIAL NAMED PLAINTIFFS FOR SECOND AMENDED COMPLAINT; CONSIDERATION OF ISSUES RE SAME
3/22/2020	\$525.00	2.6	\$1,365.00	WORK ON AMENDED COMPLAINT; REVIEW DOCKET RE CASE MANAGEMENT STATEMENT
3/23/2020	\$525.00	2.4	\$1,260.00	WORK ON AMENDED COMPLAINT
3/24/2020	\$525.00	6.1	\$3,202.50	WORK ON AMENDED COMPLAINT; CONSIDERATION OF ISSUES RE REPRESENTATIVES, MULTI-STATE CLAIM
3/25/2020	\$525.00	3.2	\$1,680.00	WORK ON AMENDED COMPLAINT
3/26/2020	\$525.00	3.1	\$1,627.50	WORK ON AMENDED COMPLAINT; CALLS TO CLIENTS RE SAME; EMAIL TO DEFENDANTS RE ARBITRATION AGREEMENTS FOR PROSPECTIVE CLASS REPRESENTATIVES
3/27/2020	\$525.00	2.2	\$1,155.00	WORK ON STATUS LETTER, AMENDED COMPLAINT
3/29/2020	\$525.00	3.3	\$1,732.50	WORK ON AMENDED COMPLAINT
3/30/2020	\$525.00	4.7	\$2,467.50	WORK ON AMENDED COMPLAINT
3/31/2020	\$525.00	1.4	\$735.00	REVIEW ARBITRATION AGREEMENTS PRODUCED PURSUANT TO PROTECTIVE ORDER

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4/5/2020	\$525.00	0.4	\$210.00	WORK ON JOIN PRE-MOTION LETTER TO COURT
4/6/2020	\$525.00	1.1	\$577.50	WORK ON JOINT PRE-MOTION LETTER RE DEFENDANTS' MOTION TO DISMISS
4/8/2020	\$525.00	1.8	\$945.00	REVIEW INITIAL DISCOVERY DEMANDS; CONSIDERATION OF ISSUES RE DISCOVERY FOR NAMED OWNER DEFENDANTS; CONSIDERATION OF ISSUES RE BRIEFING SCHEDULE ON MOTION TO DISMISS
4/13/2020	\$525.00	3.1	\$1,627.50	CONSIDERATION OF ISSUES RE CASE STATUS, STATUS OF ARBITRATIONS, PAGA ACTION, DISTRIBUTION OF LABOR RE SAME
4/29/2020	\$525.00	1.3	\$682.50	WORK ON INITIAL DISCLOSURES; CONSIDERATION OF ISSUES RE DISCOVERY
5/4/2020	\$525.00	0.2	\$105.00	CONSIDERATION OF ISSUES RE DEFENDANTS' REQUEST FOR EXTENSION ON MOTION TO DISMISS BRIEFING; REVIEW CASE STATUS
5/22/2020	\$525.00	3.7	\$1,942.50	REVIEW AND ANALYZE MOTION TO DISMISS; WORK ON OPPOSITION TO SAME; RESEARCH RE SAME
6/2/2020	\$525.00	1.3	\$682.50	CONSIDERATION OF ISSUES RE DISCOVERY
6/3/2020	\$525.00	2.4	\$1,260.00	WORK ON OPPOSITION TO MOTION TO DISMISS
6/4/2020	\$525.00	1.7	\$892.50	CONSIDERATION OF ISSUES RE MOTION TO DISMISS
6/5/2020	\$525.00	5.7	\$2,992.50	WORK ON OPPOSITION TO MOTION TO DISMISS; RESEARCH RE SAME
6/6/2020	\$525.00	2.6	\$1,365.00	WORK ON OPPOSITION TO MOTION TO DISMISS
6/8/2020	\$525.00	7.8	\$4,095.00	WORK ON OPPOSITION TO MOTION TO DISMISS; RESEARCH RE SAME
6/9/2020	\$525.00	8.9	\$4,672.50	WORK ON OPPOSITION TO MOTION TO DISMISS; CONSIDERATION OF ISSUES RE DISCOVERY; CORRESPONDENCE TO DEFENDANTS RE DISCOVERY RESPONSES; CONSIDERATION OF ISSUES RE HEARING
6/10/2020	\$525.00	6.8	\$3,570.00	WORK ON OPPOSITION TO MOTION TO DISMISS
6/26/2020	\$525.00	0.8	\$420.00	- REVIEW AND ANALYZE DEFENDANTS' DISCOVERY DEMANDS; CONSIDERATION OF ISSUES RE SAME
7/9/2020	\$525.00	2.1	\$1,102.50	WORK ON INTERROGATORY RESPONSES
7/13/2020	\$525.00	3.1	\$1,627.50	RESEARCH RE INDEPENDENT CONTRACTOR STATUS IN WASHINGTON D.C.
7/16/2020	\$525.00	1.2	\$630.00	COMMUNICATIONS WITH CLIENTS RE DISCOVERY RESPONSES
7/17/2020	\$525.00	0.8	\$420.00	REVIEW CORRESPONDENCE RE ARBITRATION AGREEMENTS UNDER OPERATIVE PROTECTIVE ORDER
7/20/2020	\$525.00	1.1	\$577.50	CONSIDERATION OF ISSUES RE DISCOVERY; REVIEW CORRESPONDENCE RE SAME
7/22/2020	\$525.00	2.6	\$1,365.00	REVIEW DISCOVERY RESPONSES; CONSIDERATION OF ISSUES RE DISCOVERY DISPUTE; WORK ON EMAIL RE SAME
7/23/2020	\$525.00	1.2	\$630.00	WORK ON PLAINTIFFS' DISCOVERY RESPONSES; CONSIDERATION OF ISSUES RE SAME
7/24/2020	\$525.00	2.2	\$1,155.00	WORK ON DISCOVERY RESPONSES
7/25/2020	\$525.00	2.1	\$1,102.50	WORK ON NAMED PLAINTIFF DISCOVERY RESPONSES
7/27/2020	\$525.00	6.4	\$3,360.00	MEET AND CONFER RE DISCOVERY; PREPARE FOR SAME; CONSIDERATION OF ISSUES RE SAME; WORK ON DISCOVERY RESPONSES
7/28/2020	\$525.00	3.7	\$1,942.50	WORK ON DISCOVERY RESPONSES; CONSIDERATION OF ISSUES RE SAME

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7/29/2020	\$525.00	6.1	\$3,202.50	REVIEW AND ANALYZE DISCOVERY RESPONSES; CONSIDERATION OF ISSUES RE DISCOVERY; REVIEW AND ANALYZE DEPARTMENT OF LABOR SUMMARY JUDGMENT MOTION IN RELATED D. ARIZ. CASE, DEPOSITION TRANSCRIPTS FILED WITH SAME
7/30/2020	\$525.00	3.6	\$1,890.00	REVIEW AND ANALYZE SUPPORTING DOCUMENTS TO DEPARTMENT OF LABOR SUMMARY JUDGMENT MOTION IN RELATED FEDERAL CASE
8/6/2020	\$525.00	2.3	\$1,207.50	WORK ON PRE-MOTION LETTER RE MOTION TO COMPEL DISCOVERY; REVIEW AND ANALYZE CORRESPONDENCE ON DISCOVERY, MEET AND CONFER EFFORTS
8/7/2020	\$525.00	1.7	\$892.50	PREPARE FOR CALL RE DISCOVERY; REVIEW DRAFT PROTECTIVE ORDER; CONSIDERATION OF ISSUES RE SAME
8/11/2020	\$525.00	1.6	\$840.00	CONSIDERATION OF ISSUES RE DISCOVERY; CORRESPONDENCE WITH DEFENDANTS RE SAME; WORK ON DISCOVERY DISPUTE LETTER
8/12/2020	\$525.00	4.7	\$2,467.50	WORK ON DISCOVERY DEMANDS, LETTER TO COURT RE DISCOVERY DISPUTE; REVIEW JUDGE MOSES'S RULES RE SAME; CONSIDERATION OF ISSUES RE DISCOVERY
8/13/2020	\$525.00	2.4	\$1,260.00	REVIEW DISCOVERY ISSUES; WORK ON LETTER TO COURT RE SAME; CONSIDERATION OF ISSUES RE SAME
8/16/2020	\$525.00	1.4	\$735.00	WORK ON DISCOVERY LETTER; CONSIDERATION OF ISSUES RE ESI DISCOVERY
8/17/2020	\$525.00	3.8	\$1,995.00	WORK ON DISCOVERY LETTER TO COURT; CONSIDERATION OF ISSUES RE MOTION TO DISMISS, AMENDING COMPLAINT, SEPARATING CLAIMS
8/25/2020	\$525.00	2.3	\$1,207.50	WORK ON DISCOVERY DEMANDS; CONSIDERATION OF ISSUES RE SAME
8/26/2020	\$525.00	0.6	\$315.00	WORK ON DISCOVERY DEMANDS
8/27/2020	\$525.00	2.1	\$1,102.50	WORK ON DISCOVERY DEMANDS
9/4/2020	\$525.00	3.2	\$1,680.00	WORK ON DISCOVERY DEMANDS
9/8/2020	\$525.00	1.4	\$735.00	DISCOVERY CONFERENCE; PREPARE FOR SAME; CONSIDERATION OF ISSUES RE SAME
9/21/2020	\$525.00	0.5	\$262.50	CONFER WITH A. CHAN RE CASE STATUS
9/22/2020	\$525.00	0.6	\$315.00	CONFER WITH A. CHAN RE CASE STATUS, WORKFLOW, NOTICE OF SUPPLEMENTAL AUTHORITY; CONSIDERATION OF ISSUES RE SUPPLEMENTAL AUTHORITY RE MOTION TO DISMISS OPPOSITION
9/23/2020	\$525.00	0.3	\$157.50	WRITTEN OFF AS BILLING JUDGMENT
9/24/2020	\$525.00	2.1	\$1,102.50	WRITTEN OFF AS BILLING JUDGMENT
9/25/2020	\$525.00	2.2	\$1,155.00	REVIEW AND ANALYZE MOTION TO DISMISS ORDER; CONSIDERATION OF ISSUES RE AMENDING COMPLAINT; REVIEW AND ANALYZE DOCUMENTS AND INTAKE INFORMATION RE NAMED PLAINTIFFS
9/30/2020	\$525.00	0.4	\$210.00	WORK ON THIRD AMENDED COMPLAINT
10/2/2020	\$525.00	2.9	\$1,522.50	WORK ON THIRD AMENDED COMPLAINT; CONSIDERATION OF ISSUES RE CLIENT-SPECIFIC INFORMATION
10/9/2020	\$525.00	3.1	\$1,627.50	WORK ON THIRD AMENDED COMPLAINT; CONSIDERATION OF ISSUES RE NUMEROSITY OF DRIVERS WITHOUT ARBITRATION AGREEMENTS
10/15/2020	\$525.00	3.4	\$1,785.00	WORK ON THIRD AMENDED COMPLAINT; LETTER MOTION RE SAME; DOCUMENT REVIEW RE SAME

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

10/16/2020	\$525.00	11.2	\$5,880.00	WORK ON THIRD AMENDED COMPLAINT, LETTER MOTION FOR LEAVE TO FILE SAME; RESEARCH RE SAME; DOCUMENT REVIEW RE SAME
10/20/2020	\$525.00	3.2	\$1,680.00	REVIEW AND ANALYZE DOCUMENTS FROM DEPARTMENT OF LABOR LAWSUIT AGAINST DEFENDANTS
10/28/2020	\$525.00	0.3	\$157.50	REVIEW AND ANALYZE ORDER RE AMENDING COMPLAINT
10/30/2020	\$525.00	3.4	\$1,785.00	WORK ON THIRD AMENDED COMPLAINT; CONSIDERATION OF ISSUES RE SAME; WORK ON OPT-IN SUBMISSIONS
11/5/2020	\$525.00	1.3	\$682.50	REVIEW NOTICE OF OPT-IN PLAINTIFFS FILING; WORK ON CORRECTED VERSION OF SAME; REVIEW CORRESPONDENCE RE OPT-IN DRIVERS
11/11/2020	\$525.00	1.2	\$630.00	REVIEW CASE STATUS, DEADLINES FOR ANSWER; CONSIDERATION OF ISSUES RE DISCOVERY
11/16/2020	\$525.00	1.3	\$682.50	REVIEW OPT-IN DISCOVERY DEMANDS; CONSIDERATION OF ISSUES RE SAME; WORK ON RESPONSES RE SAME
11/17/2020	\$525.00	1.2	\$630.00	CONSIDERATION OF ISSUES RE DISCOVERY; WORK ON REQUEST FOR PRODUCTION OF DOCUMENTS RE DEPARTMENT OF LABOR ACTION IN ARIZONA
11/23/2020	\$525.00	0.9	\$472.50	WORK ON DISCOVERY DEMANDS; CONSIDERATION OF ISSUES RE SAME
11/25/2020	\$525.00	0.6	\$315.00	REVIEW SCHEDULE RE REQUEST FOR LEAVE TO FILE MOTION TO DISMISS; CONSIDERATION OF ISSUES RE SAME
12/3/2020	\$525.00	0.8	\$420.00	WORK ON PRE-MOTION LETTER OPPOSITION RE MOTION TO DISMISS
12/4/2020	\$525.00	0.3	\$157.50	WORK ON STATUS LETTER TO COURT
12/8/2020	\$525.00	3.8	\$1,995.00	DOCUMENT REVIEW; CONSIDERATION OF ISSUES RE DISCOVERY, FORTHCOMING MOTION TO DISMISS
12/9/2020	\$525.00	2.8	\$1,470.00	STATUS CONFERENCE CALL; PREPARE FOR SAME; CONSIDERATION OF ISSUES RE SAME; WORK ON 30(B)(6) DEPOSITION NOTICES TO PARTS AUTHORITY AND DILIGENT
12/21/2020	\$525.00	2.8	\$1,470.00	REVIEW AND ANALYZE MOTION TO DISMISS; CONSIDERATION OF ISSUES RE SAME; RESEARCH RE SAME
1/4/2021	\$525.00	0.8	\$420.00	CONSIDERATION OF ISSUES RE DISCOVERY PRODUCTION
1/5/2021	\$525.00	0.7	\$367.50	CONSIDERATION OF ISSUES RE SERVICE ON L. BROWNE
1/7/2021	\$525.00	0.7	\$367.50	WORK ON MEET AND CONFER EFFORTS RE 30(B)(6) DEPOSITIONS; CONSIDERATION OF ISSUES RE MEDIATION
1/8/2021	\$525.00	0.3	\$157.50	WRITTEN OFF AS BILLING JUDGMENT
1/28/2021	\$525.00	0.7	\$367.50	CONSIDERATION OF ISSUES RE MOTION TO DISMISS OPPOSITION; REVIEW AND ANALYZE MOTION TO DISMISS
2/1/2021	\$525.00	1.8	\$945.00	PREPARE FOR MEDIATION
2/2/2021	\$525.00	2.3	\$1,207.50	CONSIDERATION OF ISSUES RE MEDIATION, GLOBAL RESOLUTION
2/3/2021	\$525.00	5.8	\$3,045.00	CONSIDERATION OF ISSUES RE MOTION TO DISMISS; REVIEW AND ANALYZE MOTION; RESEARCH RE OPPOSITION
2/4/2021	\$525.00	5.3	\$2,782.50	WORK ON RESPONSES TO INDIVIDUAL SETTLEMENT OFFERS; CONSIDERATION OF ISSUES RE SAME; WORK ON JOINT STATUS LETTER TO COURT; CONSIDERATION OF ISSUES RE DISCOVERY, DEPOSITIONS
2/5/2021	\$525.00	4.8	\$2,520.00	WORK ON OPPOSITION TO MOTION TO DISMISS; CONSIDERATION OF ISSUES RE SAME; RESEARCH RE SAME

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

2/8/2021	\$525.00	3.1	\$1,627.50	CALL WITH COURT RE DISCOVERY; PREPARE FOR SAME; CONSIDERATION OF ISSUES RE DISCOVERY; DOCUMENT REVIEW
2/10/2021	\$525.00	1.9	\$997.50	CONSIDERATION OF ISSUES RE SETTLEMENT OFFERS
2/12/2021	\$525.00	4.1	\$2,152.50	WORK ON OPPOSITION TO MOTION TO DISMISS
2/14/2021	\$525.00	3.4	\$1,785.00	WORK ON OPPOSITION TO MOTION TO DISMISS THIRD AMENDED COMPLAINT
2/15/2021	\$525.00	9.2	\$4,830.00	WORK ON OPPOSITION TO MOTION TO DISMISS; REVIEW AFFIDAVIT OF SERVICE ON L. BROWNE; CONSIDERATION OF ISSUES RE FILING SAME WITH COURT
2/18/2021	\$525.00	1.4	\$735.00	MEET AND CONFER RE DISCOVERY; CONSIDERATION OF ISSUES RE SAME, DEADLINE EXTENSION REQUEST TO COURT
2/28/2021	\$525.00	0.2	\$105.00	WORK ON DEADLINE EXTENSION LETTER
3/3/2021	\$525.00	0.2	\$105.00	WORK ON DISCOVERY DEADLINE EXTENSION LETTER
3/4/2021	\$525.00	0.6	\$315.00	CONSIDERATION OF ISSUES RE DISCOVERY DISPUTE, NARROWING TOPICS
4/9/2021	\$525.00	3.1	\$1,627.50	CONSIDERATION OF ISSUES RE JURISDICTIONAL DISCOVERY; DOCUMENT REVIEW AND RESEARCH RE SAME
4/11/2021	\$525.00	2.4	\$1,260.00	WORK ON PROPOSED ORDER RE JURISDICTIONAL DISCOVERY; CONSIDERATION OF ISSUES RE SAME
4/12/2021	\$525.00	0.8	\$420.00	CONFER WITH DEFENDANTS RE JURISDICTIONAL DISCOVERY; CONSIDERATION OF ISSUES RE SAME
4/13/2021	\$525.00	5.8	\$3,045.00	WORK ON JURISDICTIONAL DISCOVERY DEMANDS; REVIEW DOCUMENTS RE SAME; CONSIDERATION OF ISSUES RE SAME
4/15/2021	\$525.00	1.2	\$630.00	CONSIDERATION OF ISSUES RE JURISDICTIONAL DISCOVERY
4/20/2021	\$525.00	2.2	\$1,155.00	CONSIDERATION OF ISSUES RE JURISDICTIONAL DISCOVERY; DOCUMENT REVIEW; WORK ON EMAIL TO DEFENDANTS RE DISCOVERY; WORK ON LETTER TO COURT
4/21/2021	\$525.00	2.8	\$1,470.00	CONSIDERATION OF ISSUES RE JURISDICTIONAL DISCOVERY; DOCUMENT REVIEW
4/22/2021	\$525.00	2.4	\$1,260.00	CONSIDERATION OF ISSUES RE JURISDICTIONAL DISCOVERY; CORRESPONDENCE WITH DEFENDANTS RE SAME; DOCUMENT REVIEW
4/28/2021	\$525.00	1.4	\$735.00	CONFERENCE CALL WITH MAGISTRATE; PREPARE FOR SAME
5/17/2021	\$525.00	0.7	\$367.50	CONSIDERATION OF ISSUES RE DISCOVERY DISPUTES; REVIEW NOTES FROM MEET AND CONFER CALLS RE SAME
5/20/2021	\$525.00	1.1	\$577.50	CONSIDERATION OF ISSUES RE SUPPLEMENTAL RESPONSE RE MOTION TO DISMISS
10/5/2021	\$525.00	1.4	\$735.00	CONSIDERATION OF ISSUES RE DISCOVERY DISPUTES, ESI; CONSIDERATION OF ISSUES RE SETTLEMENT
10/6/2021	\$525.00	1	\$525.00	CONSIDERATION OF ISSUES RE ESI DISCOVERY
10/7/2021	\$525.00	0.7	\$367.50	REVIEW AND ANALYZE CORRESPONDENCE RE DISCOVERY; CONSIDERATION OF ISSUES RE SAME, ESI

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

	10/8/2021	\$525.00	5.4	\$2,835.00	CORRESPONDENCE WITH J. FLOWERS RE DECLARATION ON G-SUITE FUNCTIONALITY; CALL WITH J. FLOWERS RE SAME; WORK ON DECLARATION RE SAME; WORK ON DISCOVERY DISPUTE LETTER TO COURT
	10/13/2021	\$525.00	1.2	\$630.00	WORK ON DISCOVERY DISPUTE LETTER
	10/14/2021	\$525.00	1.4	\$735.00	WORK ON DISCOVERY DISPUTE LETTER
	10/15/2021	\$525.00	0.9	\$472.50	CONSIDERATION OF ISSUES RE DEPOSITION SCHEDULING; WORK ON CHEEKS LETTERS RE SETTling OPT-IN PLAINTIFFS
	10/19/2021	\$525.00	1.1	\$577.50	WORK ON CHEEKS LETTER; CONSIDERATION OF ISSUES RE SAME
	10/20/2021	\$525.00	4.2	\$2,205.00	CONSIDERATION OF ISSUES RE CHEEKS LETTER; WORK ON SAME, SUPPORTING DOCUMENTS; WORK ON REPLY LETTER RE ESI DISPUTE
	10/21/2021	\$525.00	0.3	\$157.50	CONSIDERATION OF ISSUES RE R. BREA DEPOSITION
	10/26/2021	\$525.00	0.2	\$105.00	CONSIDERATION OF ISSUES RE DEPOSITIONS, RESCHEDULING SAME
	10/29/2021	\$525.00	1.4	\$735.00	CONSIDERATION OF ISSUES RE DEPOSITIONS, DOCUMENTS FOR SAME; PREPARE FOR M. MERO DEPOSITION
	10/31/2021	\$525.00	0.3	\$157.50	CONSIDERATION OF ISSUES RE M. MERO DEPOSITION
	11/15/2021	\$525.00	2.4	\$1,260.00	WORK ON SETTLEMENT AGREEMENT; CONSIDERATION OF ISSUES RE SAME; CORRESPONDENCE WITH DEFENDANT RE UPDATING COURT ON STATUS
	11/16/2021	\$525.00	1.1	\$577.50	WORK ON SETTLEMENT AGREEMENT; CONSIDERATION OF ISSUES RE SAME
Olena Ball, Associate, Cardozo Law, 2005	12/17/2019	\$475.00	4.2	\$1,995.00	WORK ON DISCOVERY REQUESTS (RPPS AND INTERROGATORIES)
	12/23/2019	\$475.00	5.1	\$2,422.50	WORK ON RFP AND INTERROGATORIES TO DEFENDANTS
	12/24/2019	\$475.00	2.4	\$1,140.00	WORK ON FINALIZING RFPs AND INTERROGATORIES TO DEFENDANTS
	12/30/2019	\$475.00	0.2	\$95.00	MEETING WITH ANDREW AND JARED RE REPRESENTATIVE PLAINTIFFS
	12/30/2019	\$475.00	3.5	\$1,662.50	CALL POTENTIAL REPRESENTATIVE PLAINTIFFS
	12/31/2019	\$475.00	0.4	\$190.00	CALLS RE REPRESENTATIVE PLAINTIFFS
	1/2/2020	\$475.00	1	\$475.00	PREPARE AND SEND OPT-IN FORMS
	1/2/2020	\$475.00	0.5	\$237.50	EMAILS RE REPRESENTATIVE PLAINTIFFS
	1/2/2020	\$475.00	0.5	\$237.50	CALLS WITH REPRESENTATIVE PLAINTIFFS
	1/3/2020	\$475.00	0.2	\$95.00	CALLS AND EMAILS TO AND RE REPRESENTATIVE PLAINTIFFS
	1/6/2020	\$475.00	0.7	\$332.50	EMAILS RE REPRESENTATIVE PLAINTIFFS
	1/13/2020	\$475.00	0.5	\$237.50	CALLS AND EMAILS RE REPRESENTATIVE PLAINTIFFS
	1/21/2020	\$475.00	1.2	\$570.00	CALLS
	3/26/2020	\$475.00	0.4	\$190.00	CALLS AND EMAILS RE AMENDED COMPLAINT
	3/27/2020	\$475.00	4.2	\$1,995.00	WORK ON JOINT STATUS LETTER, CALLS AND EMAILS RE AMENDED COMPLAINT
	3/28/2020	\$475.00	0.4	\$190.00	CALLS AND EMAILS RE AMENDED COMPLAINT
	3/29/2020	\$475.00	1.7	\$807.50	CALLS AND EMAILS RE AMENDED COMPLAINT
	3/30/2020	\$475.00	0.4	\$190.00	CALLS AND EMAILS RE AMENDED COMPLAINT
	7/6/2020	\$475.00	0.8	\$380.00	EMAILS WITH MARK POTASHNICK RE CLIENT DISCOVERY DOCUMENTS FOR PRODUCTION

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

7/23/2020	\$475.00	1.1	\$522.50	CALLS, EMAILS AND TEXT MESSAGES WITH CLIENTS RE DISCOVERY REQUESTS
7/24/2020	\$475.00	1.9	\$902.50	CALLS AND EMAILS RE DISCOVERY RESPONSES
7/27/2020	\$475.00	1	\$475.00	CALLS AND EMAILS RE CLIENT CLAIMS
7/27/2020	\$475.00	5.9	\$2,802.50	PREPARATION OF DISCOVERY RESPONSES; CALLS, TEXT MESSAGES AND EMAILS RE SAME
7/28/2020	\$475.00	2	\$950.00	COLLECTING DISCOVERY; CALLS, EMAILS AND TEXT MESSAGES RE SAME
7/29/2020	\$475.00	0.4	\$190.00	CALLS AND EMAILS RE DISCOVERY COLLECTION
7/30/2020	\$475.00	0.5	\$237.50	CALLS AND EMAILS RE DISCOVERY COLLECTION
7/31/2020	\$475.00	0.1	\$47.50	EMAILS RE DISCOVERY
8/12/2020	\$475.00	0.2	\$95.00	EMAILS RE DISCOVERY REQUESTS
9/10/2020	\$475.00	0.1	\$47.50	CLIENT CALL RE CASE UPDATE
9/11/2020	\$475.00	2.3	\$1,092.50	DRAFT ADDITIONAL DISCOVERY REQUESTS
9/25/2020	\$475.00	0.2	\$95.00	REVIEW CASE EMAILS
9/30/2020	\$475.00	0.4	\$190.00	EMAILS RE INFORMATION GATHERING FOR THIRD AMENDED COMPLAINT
10/5/2020	\$475.00	0.7	\$332.50	REVIEW FACTS AND CLAIMS FOR THIRD AMENDED COMPLAINT; EMAILS RE SAME
10/8/2020	\$475.00	0.2	\$95.00	REVIEW THIRD AMENDED COMPLAINT
10/16/2020	\$475.00	0.3	\$142.50	EMAILS REGARDING CLIENT FACTS
10/19/2020	\$475.00	0.1	\$47.50	REVIEW TEAM EMAILS
10/23/2020	\$475.00	0.1	\$47.50	CLIENT CALL RE CASE UPDATE
10/26/2020	\$475.00	0.1	\$47.50	CALL AND EMAIL RE CLIENT OPT-IN
10/30/2020	\$475.00	1.5	\$712.50	EMAILS RE CLIENT OPT-IN; INFORMATION GATHERING RE SAME
11/19/2020	\$475.00	1.8	\$855.00	WORK ON SECOND REQUESTS FOR PRODUCTION
11/23/2020	\$475.00	1.5	\$712.50	WORK ON SECOND REQUESTS FOR PRODUCTION; CALL RE SAME
12/3/2020	\$475.00	1.8	\$855.00	RESEARCH SERIAL MOTIONS FOR RESPONSE LETTER; REVIEW RESPONSE LETTER; EMAILS RE SAME
12/4/2020	\$475.00	0.3	\$142.50	REVIEW SAMPLE OPT-IN OBJECTIONS
12/6/2020	\$475.00	0.2	\$95.00	WORK ON OPT-IN PLAINTIFF DISCOVERY RESPONSES
12/7/2020	\$475.00	6.8	\$3,230.00	WORK ON OPT-IN DISCOVERY OBJECTIONS; RESEARCH RE SAME
12/8/2020	\$475.00	5.2	\$2,470.00	WORK ON OPT-IN PLAINTIFF DISCOVERY OBJECTIONS; DISCOVERY CONFERRAL CALL WITH DEFENDANTS
12/9/2020	\$475.00	3.4	\$1,615.00	WORK ON OPT-IN PLAINTIFF DISCOVERY RESPONSES; RESEARCH RE SAME; REVIEW DEPOSITION NOTICES
12/10/2020	\$475.00	4.1	\$1,947.50	WORK ON OPT-IN PLAINTIFF OBJECTIONS; CALLS RE DEPOSITIONS; REVIEW DEPOSITION NOTICES
12/11/2020	\$475.00	0.4	\$190.00	CALLS AND TEXT MESSAGES REGARDING DEPOSITIONS
12/14/2020	\$475.00	3.1	\$1,472.50	CALLS RE DEPOSITIONS; EDIT COMPLAINT; TEAM EMAILS OPT-IN DISCOVERY, ETC.
12/15/2020	\$475.00	0.1	\$47.50	CALLS RE DEPOSITIONS
12/17/2020	\$475.00	0.1	\$47.50	CALL AND EMAIL RE DEPOSITIONS
12/18/2020	\$475.00	0.2	\$95.00	EMAILS; REVIEW LETTER RE DEPOSITIONS
12/21/2020	\$475.00	4.1	\$1,947.50	WORK ON OPT-IN DISCOVERY RESPONSES; CALLS RE SAME
12/22/2020	\$475.00	1.4	\$665.00	WORK ON OPT-IN DISCOVERY RESPONSES; EMAIL RE SAME

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

12/23/2020	\$475.00	0.5	\$237.50	CALLS AND TEXT MESSAGES RE OPT-IN DISCOVERY
12/28/2020	\$475.00	1	\$475.00	WORK ON OPT-IN DISCOVERY RESPONSES
12/30/2020	\$475.00	0.1	\$47.50	CALL RE OPT-IN DISCOVERY
1/4/2021	\$475.00	0.4	\$190.00	CALLS RE DEPOSITION SCHEDULING; EMAILS RE SAME
1/13/2021	\$475.00	1.5	\$712.50	GATHERING DOCUMENTS FOR DEPOSITION PREPARATION; EMAIL RE SAME
1/25/2021	\$475.00	0.2	\$95.00	CALL RE POTENTIAL SETTLEMENT AUTHORIZATION
1/26/2021	\$475.00	0.3	\$142.50	EMAILS RE MEDIATION
1/27/2021	\$475.00	2.7	\$1,282.50	CALLS RE MEDIATION SETTLEMENT AUTHORIZATION
1/28/2021	\$475.00	4.5	\$2,137.50	WORK ON MEDIATION STATEMENT CITES; CALL RE SAME
1/29/2021	\$475.00	0.2	\$95.00	CALL ADD EMAIL RE MEDIATION SETTLEMENT AUTHORIZATION
2/8/2021	\$475.00	0.9	\$427.50	REVIEW OUTSTANDING DISCOVERY ISSUES
3/3/2021	\$475.00	0.5	\$237.50	EMAIL REVIEW
3/25/2021	\$475.00	1.3	\$617.50	CLIENT CALLS RE DISCOVERY; EMAILS RE SAME
4/22/2021	\$475.00	0.1	\$47.50	REVIEW EMAILS
5/5/2021	\$475.00	0.5	\$237.50	CLIENT CALL AND TEXT REGARDING DISCOVERY; EMAIL RE SAME
5/13/2021	\$475.00	1.5	\$712.50	CALLS RE OPT-IN DISCOVERY; WORK ON SAME
5/20/2021	\$475.00	0.5	\$237.50	CLIENT CALL RE OPT-IN DISCOVERY
5/24/2021	\$475.00	0.4	\$190.00	EMAIL RE OPT-IN DISCOVERY
5/27/2021	\$475.00	0.2	\$95.00	WORK ON OPT-IN DISCOVER RESPONSES
6/8/2021	\$475.00	0.3	\$142.50	CLIENT CALL RE OPT-IN DISCOVERY
6/8/2021	\$475.00	1	\$475.00	REVIEW AND EDIT OPT-IN L. BROWN SETTLEMENT AGREEMENT; EMAIL RE SAME
6/22/2021	\$475.00	2.9	\$1,377.50	WORK ON OPT-IN DISCOVERY RESPONSES; CALLS RE SAME
6/29/2021	\$475.00	2.5	\$1,187.50	WORK ON OPT-IN DISCOVERY RESPONSES
7/1/2021	\$475.00	2.6	\$1,235.00	EDIT OPT-IN DISCOVERY RESPONSES; EMAILS, TEXT AND CALL RE SAME; EDIT L. SIMS' SETTLEMENT AGREEMENT; CLIENT CALL AND EMAIL RE SAME
7/12/2021	\$475.00	4.9	\$2,327.50	TEAM CALL; PREPARATION FOR SAME - INFORMATION GATHERING; CLIENT IRS TAX RETURN REQUEST; CLIENT CALLS RE DISCOVERY AND DEPOSITIONS; EMAILS RE ALL
7/14/2021	\$475.00	3.1	\$1,472.50	WORK ON OPT-IN DISCOVERY
7/15/2021	\$475.00	2.8	\$1,330.00	WORK ON OPT-IN DISCOVERY
7/19/2021	\$475.00	0.1	\$47.50	CLIENT CALL RE DEPOSITION; EMAIL RE SAME
7/20/2021	\$475.00	0.5	\$237.50	TEAM CALL AND CLIENT CALLS RE DEPOSITIONS
7/22/2021	\$475.00	0.2	\$95.00	REVIEW EMAILS
7/23/2021	\$475.00	0.8	\$380.00	EDIT SETTLEMENT AGREEMENT OF LATOYA BROWN; EMAILS RE SAME; CLIENT CALL RE SAME
7/30/2021	\$475.00	0.3	\$142.50	REVIEW EMAILS RE SETTLEMENT NEGOTIATIONS; EMAILS RE SAME
7/30/2021	\$475.00	0.1	\$47.50	WORK ON HENAO DISCOVERY
8/2/2021	\$475.00	0.3	\$142.50	CLIENT CALL RE DEPOSITION AND SETTLEMENT OFFER
8/10/2021	\$475.00	0.3	\$142.50	REVIEW OPPOSING COUNSEL'S LETTER
8/12/2021	\$475.00	0.2	\$95.00	REVIEW EMAILS RE DISCOVERY
8/13/2021	\$475.00	1	\$475.00	REVIEW DRAFT JOINT LETTER, ESI PROTOCOL AND EMAILS
8/18/2021	\$475.00	0.1	\$47.50	CLIENT CALL RE SETTLEMENT - OPT-IN LATOYA BROWN-GILLIS

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

8/23/2021	\$475.00	0.6	\$285.00	CALLS RE DISCOVERY
8/24/2021	\$475.00	1.9	\$902.50	CLIENT CALLS RE DISCOVERY; EMAILS RE DISCOVERY; EMAILS RE SETTLEMENTS
8/25/2021	\$475.00	1.8	\$855.00	CALLS AND TEXT MESSAGES RE DEPOSITION SCHEDULING; EMAILS AND CALLS RE DISCOVERY
8/27/2021	\$475.00	1.4	\$665.00	CLIENT CALL (BREA); IRS TAX RETURN REQUEST; REVIEW DRAFT EMAIL TO OPPOSING COUNSEL
9/8/2021	\$475.00	2.6	\$1,235.00	CLIENT CALLS RE OPT-IN FORMS AND LETTER TO THE COURT; EMAILS RE SAME; WORK WITH OPT-IN BREA ON IRS TAX RETURN REQUEST; EMAILS RE SAME
9/9/2021	\$475.00	0.1	\$47.50	EMAILS RE HEADD'S OPT-IN CONSENT FORM
9/10/2021	\$475.00	1	\$475.00	CALLS AND EMAILS RE SETTLEMENT AGREEMENTS
9/13/2021	\$475.00	1.2	\$570.00	CALLS AND EMAILS RE DEPOSITIONS; EMAILS RE OPT-IN DISMISSALS
9/15/2021	\$475.00	1.8	\$855.00	CALLS, TEXTS AND EMAILS RE SETTLEMENT, DISCOVERY AND DEPOSITIONS
9/16/2021	\$475.00	1	\$475.00	REVIEW OPT-IN DISMISSALS; CALLS AND EMAILS RE SETTLEMENT; UPDATE CHART
9/17/2021	\$475.00	0.1	\$47.50	REVIEW EMAILS
9/17/2021	\$475.00	1.3	\$617.50	EMAILS RE OPT-IN SETTLEMENTS; EDIT SETTLEMENT AGREEMENT
9/20/2021	\$475.00	6.9	\$3,277.50	WORK ON CHEEKS LETTER FOR OPT-IN DISMISSAL
9/21/2021	\$475.00	5.3	\$2,517.50	WORK ON CHEEKS LETTERS FOR OPT-IN DISMISSALS; EMAILS
9/23/2021	\$475.00	2.4	\$1,140.00	WORK ON CHEEKS LETTERS FOR OPT-IN DISMISSALS; EMAILS RE SAME
9/24/2021	\$475.00	0.3	\$142.50	CALLS RE SETTLEMENT AND DEPOSITIONS
9/27/2021	\$475.00	0.6	\$285.00	CALLS, TEXT AND EMAILS RE SETTLEMENT AND DEPOSITION
10/1/2021	\$475.00	0.2	\$95.00	CLIENT CALL
10/4/2021	\$475.00	0.6	\$285.00	CLIENT CALLS RE DEPOSITION; EMAILS RE SAME
10/5/2021	\$475.00	0.2	\$95.00	CALL AND EMAIL RE DEPOSITION
10/6/2021	\$475.00	0.7	\$332.50	CALL AND EMAILS RE DEPOSITIONS AND DISCOVERY
10/7/2021	\$475.00	0.4	\$190.00	CALCULATIONS FOR CHEEKS APPROVAL LETTERS
10/8/2021	\$475.00	0.8	\$380.00	CALL AND EMAILS RE DEPOSITIONS
10/11/2021	\$475.00	1.6	\$760.00	EDIT CHEEKS LETTER; CALLS AND EMAILS RE DEPOSITION
10/12/2021	\$475.00	9.1	\$4,322.50	EDIT CHEEKS APPROVAL LETTERS; WORK ON PROPOSED ORDER; RESEARCH RE SAME
10/14/2021	\$475.00	1.4	\$665.00	EDIT CHEEKS LETTERS; CLIENT CALL
10/15/2021	\$475.00	7.2	\$3,420.00	REVIEW SHAWN WILLIAMS' DEPOSITION TRANSCRIPT; EDIT CHEEKS LETTER AND PROPOSED ORDER; EDIT OPT-IN SETTLEMENT AGREEMENTS; CLIENT CALLS RE SAME; EMAILS RE SAME
10/18/2021	\$475.00	6.8	\$3,230.00	EDIT CHEEKS LETTER; RESEARCH JUDGE SCHOFIELD'S COURT RULES; REDLINE OPT-IN SETTLEMENT AGREEMENTS
10/19/2021	\$475.00	3	\$1,425.00	WORK ON PAGE-LIMIT EXTENSION LETTER TO COURT; EMAIL RE SETTLEMENTS; CALLS AND TEXT RE DEPOSITION; REVIEW EMAILS
10/20/2021	\$475.00	0.4	\$190.00	TEXT AND EMAIL RE DEPOSITIONS; EMAILS RE CHEEKS LETTER
10/21/2021	\$475.00	0.4	\$190.00	CALLS AND EMAIL RE DEPOSITIONS
10/22/2021	\$475.00	2	\$950.00	CALL AND EMAILS RE SETTLEMENTS AND DISCOVERY

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

	10/25/2021	\$475.00	0.1	\$47.50	EMAILS RE DISCOVERY
	10/26/2021	\$475.00	0.4	\$190.00	CALLS AND EMAIL RE DISCOVERY
	10/29/2021	\$475.00	1.5	\$712.50	CALLS AND EMAILS RE DISCOVERY AND DEPOSITIONS
	11/1/2021	\$475.00	0.4	\$190.00	CLIENT CALLS
	11/4/2021	\$475.00	0.7	\$332.50	CALLS AND EMAILS RE DEPOSITIONS
	11/5/2021	\$475.00	0.2	\$95.00	REVIEW CHECKS ORDER
	11/8/2021	\$475.00	2.4	\$1,140.00	EMAILS RE OPT-IN AGREEMENTS FOR COURT APPROVAL
	11/9/2021	\$475.00	0.8	\$380.00	WORK ON LETTER TO THE COURT; EMAILS RE SAME
	11/10/2021	\$475.00	0.7	\$332.50	EDIT LETTER TO THE COURT
	11/15/2021	\$475.00	0.5	\$237.50	EMAILS RE SETTLEMENT
	11/16/2021	\$475.00	3.2	\$1,520.00	RESEARCH RE INCENTIVE AWARD; GATHER INFORMATION FOR SETTLEMENT; CLIENT CALL
	11/17/2021	\$475.00	0.1	\$47.50	CALL RE SETTLEMENTS
	11/18/2021	\$475.00	0.1	\$47.50	CLIENT CALL AND TEXT RE SETTLEMENT (BROWN)
	11/23/2021	\$475.00	0.3	\$142.50	CLIENT CALLS AND EMAILS RE SETTLEMENT
	11/24/2021	\$475.00	0.5	\$237.50	CLEINT CALL; LETTER TO MAURICE HEADD RE SETTLEMENT; EMAILS RE SAME
	11/29/2021	\$475.00	2	\$950.00	EDIT TO INDIVIDUALIZE SETTLEMENT AGREEMENT; EMAIL RE SAME
	11/30/2021	\$475.00	3.8	\$1,805.00	INDIVIDUALIZE AND SEND SETTLEMENT AGREEMENTS; CLIENT CALLS RE SETTLEMENT; EMAILS RE SAME
	12/1/2021	\$475.00	0.1	\$47.50	SAVE AGREEMENTS TO SALESFORCE
	12/2/2021	\$475.00	0.1	\$47.50	EMAILS RE SETTLMENTS
	12/6/2021	\$475.00	0.2	\$95.00	CLIENT CALLS AND EMAIL RE LOAN AND SETTLEMENT
Scott Terrell, Associate University of Virginia Law	12/2/2019	\$450.00	7.5	\$3,375.00	RESEARCH ISSUES RELATING TO MOTION TO COMPEL AND DRAFTING LETTER
	12/5/2019	\$450.00	2.2	\$990.00	REVIEW DECLARATION IN SUPPORT OF MOTION FOR TRO
	1/3/2020	\$450.00	2.1	\$945.00	DRAFT PORTIONS OF THE COMPLAINT, INCLUDING BACKGROUND FACTS SECTION
	1/3/2020	\$450.00	2.3	\$1,035.00	REVIEW COMPLAINT BEFORE FILING AND ADDING ADDITIONAL FACTS
	1/13/2020	\$450.00	0.5	\$225.00	PARTICIPATING IN NEGOTIATIONS REGARDING STIPULATION
	1/22/2020	\$450.00	0.7	\$315.00	READ UPDATED STIPULATION REGARDING SETTLEMENT NEGOTIATIONS
	1/23/2020	\$450.00	0.7	\$315.00	READING UPDATED STIPULATION REGARDING SETTLEMENT NEGOTIATIONS
	1/29/2020	\$450.00	1	\$450.00	WRITE LETTER ON DEF. REFUSAL TO PROVIDE DISCOVERY
	2/3/2020	\$450.00	2.4	\$1,080.00	REVIEWING AND PREPARING FOR FILING LETTER RE; DISCOVERY
	4/3/2020	\$450.00	0.4	\$180.00	UPDATE PREMOTION CONFERENCE JOINT LETTER WITH ADDITIONAL ANALYSIS ON FACIAL SUFFICIENCY AND JURISDICTION
Sami Ahmad, Associate	2/10/2020	\$300.00	1	\$300.00	WRITTEN OFF AS BILLING JUDGMENT
Amanda Chan, Associate, Harvard Law School 2020	9/22/2020	\$350.00	2.15	\$752.50	REVIEW COMPLAINT, DICUSSION WITH SENIOR ASSOCIATE REGARDING THE DETAILS OF THE COMPLAINT

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

9/24/2020	\$350.00	2.8	\$980.00	RESEARCHING DISTRICT JUDGE FOR RULINGS, LEGAL RESEARCH ON DISTRICT COURTS IN THE SECOND CIRCUIT WITH REGARDS TO SUPPLEMENTAL AUTHORITY, DISCUSSION WITH SUPERVISOR/PARTNER REGARDING LEGAL ISSUES, STRATEGY, AND VARIOUS FILING CONSIDERATIONS
9/25/2020	\$350.00	0.1	\$35.00	WRITTEN OFF AS BILLING JUDGMENT
9/28/2020	\$350.00	5.97	\$2,089.50	WRITTEN OFF AS BILLING JUDGMENT
9/30/2020	\$350.00	4.37	\$1,529.50	DRAFTING LETTER TO FEDERAL COURT REGARDING THE THIRD AMENDED COMPLAINT AND CONDUCTING CALCULATIONS RELEVANT TO THE FINANCIAL RECORDS THAT WERE OBTAINED IN DISCOVERY FROM THE PLAINTIFFS
10/1/2020	\$350.00	5.2	\$1,820.00	RESEARCHING CASE LAW REGARDING MOTIONS TO STRIKE CLASS ALLEGATIONS; WRITING THE FIRST DRAFT OF A LETTER TO THE JUDGE WHERE DEFENDANTS HAVE INITIATED PROCEEDINGS TO FILE A MOTION TO STRIKE
10/1/2020	\$350.00	0.77	\$269.50	EDITING THIRD AMENDED COMPLAINT; REVIEWING DISCOVERY FILES TO SEEK INFORMATION TO ADD TO THE THIRD AMENDED COMPLAINT; CREATING AN EXCEL FILE FOR CLIENTS' PAY AND MILEAGE DETAILS TO PRESENT POSSIBLY TO THE COURT AS AN EXHIBIT
10/2/2020	\$350.00	2.9	\$1,015.00	DRAFTING THE THIRD AMENDED COMPLAINT; INPUTTING CALCULATIONS INTO EXCEL TO DEMONSTRATE SUFFICIENCY OF ALLEGATIONS UNDER FLA; TALKING WITH CLIENTS CONFIRMING SPECIFICITIES OF CLAIMS
10/7/2020	\$350.00	2.1	\$735.00	DOUBLECHECKING AND CONTINUING CALCULATIONS OF NAMED PLAINTIFFS IN ORDER TO DEMONSTRATE CLAIMS WITH SUFFICIENT SPECIFICITY UNDER THE FLA IN THE THIRD AMENDED COMPLAINT
10/8/2020	\$350.00	5.12	\$1,792.00	CALCULATING DAMAGES; FORMATTING EXCEL SHEET; INPUTTING INTO COMPLAINT AND LETTER MOTION
10/9/2020	\$350.00	5.05	\$1,767.50	EDITING DRAFT OF LETTER TO JUDGE IN THE SECOND ROUND OF EDITS; RESEARCHING CASE LAW
10/10/2020	\$350.00	1.01	\$353.50	INTEGRATING EDITS ONTO MOTION LETTER TO FILE THIRD AMENDED COMPLAINT
10/12/2020	\$350.00	4.62	\$1,617.00	EDITING LETTER MOTION AND AMENDED COMPLAINT BASED ON FEEDBACK
10/13/2020	\$350.00	4.57	\$1,599.50	EDITING MOTION LETTER; CHECKING CALCULATIONS IN THIRD AMENDED COMPLAINT; MEETING WITH COLLEAGUES TO DISCUSS
10/14/2020	\$350.00	1.35	\$472.50	EDITING AND CIRCULATING DRAFTS OF LETTER MOTION AND THIRD AMENDED COMPLAINT
10/15/2020	\$350.00	2.8	\$980.00	ADDING EDITS AND CIRCULATING DRAFT OF LETTER MOTION AND THIRD AMENDED COMPLAINT
10/18/2020	\$350.00	11.24	\$3,934.00	PROOFING, EDITING, PRINTING, CORRECTING FOR LAST DAY OF EDITS BEFORE LETTER MOTION DUE TO COURT
10/19/2020	\$350.00	0.98	\$343.00	COMMUNICATING WITH CLIENTS REGARDING THE UPDATE OF THE LATEST MOVEMENT IN THE MATTER; ANSWERING CLIENT QUESTIONS

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

10/28/2020	\$350.00	0.25	\$87.50	DRAFTING AND GATHERING PARTY PLAINTIFF CONSENT FORMS
11/9/2020	\$350.00	0.8	\$280.00	DRAFT DEFICIENCY LETTER
11/16/2020	\$350.00	0.8	\$280.00	CONSIDERATION OF DISCOVERY
11/17/2020	\$350.00	1.5	\$525.00	CONSIDERATION OF DISCOVERY
11/30/2020	\$350.00	0.9	\$315.00	CONSIDERATION OF LETTER MOTION TO DISMISS
12/3/2020	\$350.00	3.1	\$1,085.00	EDIT, PROOF, FILE LETTER RESPONSE TO MOTION TO DISMISS
12/8/2020	\$350.00	2.1	\$735.00	DISCOVERY CONFERRAL
12/8/2020	\$350.00	3.8	\$1,330.00	CONSIDERATION OF DISCOVERY; PREPARATION FOR CONFERRAL
12/9/2020	\$350.00	3.6	\$1,260.00	DRAFT DEPOSITION NOTICES
12/10/2020	\$350.00	1.1	\$385.00	PROOF AND SERVE DEPOSITION NOTICES
12/12/2020	\$350.00	2.3	\$805.00	REVISE DISCOVERY REQUESTS
12/13/2020	\$350.00	1.2	\$420.00	REVISE DISCOVERY REQUESTS
12/14/2020	\$350.00	3.4	\$1,190.00	REVISE AND DRAFT DISCOVERY REQUESTS
12/23/2020	\$350.00	4.6	\$1,610.00	DRAFT LETTER RESPONSE TO DISCOVERY DISPUTE
12/24/2020	\$350.00	1.1	\$385.00	DRAFT AND PROOF LETTER RESPONSE IN DISCOVERY DISPUTE
1/8/2021	\$350.00	0.2	\$70.00	DRAFT DEPOSITION NOTICES
1/21/2021	\$350.00	0.7	\$245.00	STRATEGY AND CONSIDERATION; PLANNING
1/27/2021	\$350.00	1.1	\$385.00	CONSIDERATION AND PLANNING
1/28/2021	\$350.00	2.3	\$805.00	CONSIDER AND PLAN MEDIATION BRIEF; PROOF AND REVISE THE SAME
1/28/2021	\$350.00	3.8	\$1,330.00	REVISE AND PROOF MEDIATION BRIEF; COMPILE EXHIBITS
2/3/2021	\$350.00	0.8	\$280.00	PROOF DISCOVERY RESPONSES
2/3/2021	\$350.00	1.1	\$385.00	CONSIDERATION AND PLANNING OF STRATEGY AND TASKS
2/4/2021	\$350.00	1.2	\$420.00	CONSIDERATION OF SETTLEMENT OFFERS
2/9/2021	\$350.00	0.6	\$210.00	DISCOVERY CONFERRAL
2/12/2021	\$350.00	1.3	\$455.00	DISCOVERY CONFERRAL
3/3/2021	\$350.00	1.4	\$490.00	DRAFT DEFICIENCY LETTER TO DEFENDANTS
3/4/2021	\$350.00	0.4	\$140.00	CONSIDERATION OF DISCOVERY RE: OPT-IN PLAINTIFFS
3/4/2021	\$350.00	0.3	\$105.00	CASE LAW RESEARCH REGARDING DISCOVERY AND CONFERRAL WITH DEFENSE COUNSEL
3/4/2021	\$350.00	0.4	\$140.00	CONSIDERATION OF DISCOVERY AND CONFERRAL WITH DEFENSE COUNSEL
3/18/2021	\$350.00	0.4	\$140.00	CONFERRAL WITH DEFENSE COUNSEL
4/9/2021	\$350.00	0.9	\$315.00	CONSIDERATION OF STRATEGY
4/16/2021	\$350.00	0.9	\$315.00	CONFERRAL WITH OPPOSING COUNSEL RE JURISDICTIONAL DISCOVERY DISPUTES
4/19/2021	\$350.00	1.4	\$490.00	DRAFT CONFERRAL SUMMARY TO CIRCULATE WITH DEFENSE COUNSEL
4/26/2021	\$350.00	0.4	\$140.00	PROOF AND REVISE LETTER TO MAGISTRATE
4/27/2021	\$350.00	0.3	\$105.00	PROOF AND REVIEW LETTER TO MAGISTRATE
5/7/2021	\$350.00	1.6	\$560.00	PREPARATION FOR UPCOMING DEPOSITION; OUTLINE DRAFT
5/8/2021	\$350.00	0.5	\$175.00	PREPARATION FOR UPCOMING 30(B)(6) DEPOSITION OF DILIGENT/NORTHEAST LOGISTICS
5/10/2021	\$350.00	1.1	\$385.00	GATHER EXHIBITS IN PREPARATION FOR DEPOSITION
5/10/2021	\$350.00	0.9	\$315.00	PREPARATION FOR UPCOMING DEPOSITION; DRAFT OUTLINE

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

5/11/2021	\$350.00	6.1	\$2,135.00	PREPARE FOR DEPOSITION; ATTEND THE SAME; TAKE NOTES; CONSIDER OUTLYING QUESTIONS; CONSIDER NEW QUESTIONS
5/17/2021	\$350.00	0.6	\$210.00	PREPARE FOR 30(B)(6) DEPOSITION OF PARTS AUTHORITY, LLC
5/17/2021	\$350.00	0.3	\$105.00	REVIEW CONFERRAL NOTES AND AMEND DEPOSITION NOTICE
5/19/2021	\$350.00	0.8	\$280.00	DRAFT DEFICIENCY LETTER FOR DILIGENT'S 30(B)(6) WITNESS
5/19/2021	\$350.00	0.1	\$35.00	DRAFT DEFICIENCY LETTER FOR DILIGENT'S 30(B)(6) WITNESS
5/31/2021	\$350.00	3.9	\$1,365.00	REVIEW TRANSCRIPT OF PARTS AUTHORITY 30(B)(6) DEPOSITION AND DRAFT DEFICIENCY LETTER RE THE SAME
6/3/2021	\$350.00	1.6	\$560.00	DRAFT DEFICIENCY LETTER RE PARTS AUTHORITY'S 30(B)(6) DEPOSITION
7/7/2021	\$350.00	1.5	\$525.00	DRAFT DEFICIENCY LETTERS RE DEFENDANTS' 30B6 DEPOSITIONS
7/8/2021	\$350.00	2.3	\$805.00	DRAFT AND EDIT DEFICIENCY LETTER RE 30B6 DEPOSITIONS;
7/12/2021	\$350.00	0.5	\$175.00	CONSIDER DEFICIENCY LETTERS; PLAN STRATEGY AND NEXT STEPS
7/16/2021	\$350.00	0.3	\$105.00	CONFER WITH OPPOSING COUNSEL
10/5/2021	\$350.00	8.1	\$2,835.00	DRAFT LETTER FOR MAGISTRATE JUDGE; CASE LAW RESEARCH FOR LETTER; EDIT, PROOF, GATHER EXHIBITS
10/6/2021	\$350.00	1.1	\$385.00	DRAFT SUMMARY OF MEET AND CONFERRAL; EDIT AND PROOF
10/6/2021	\$350.00	3.2	\$1,120.00	DRAFT PROPOSED SEARCH TERMS RE DOCUMENT PRODUCTION
10/6/2021	\$350.00	1.5	\$525.00	MEET AND CONFERRAL WITH OPPOSING COUNSEL; PREPARATION FOR THE SAME
10/6/2021	\$350.00	2.1	\$735.00	CONFER/CONSIDERATION OF STRATEGY OF CASE
10/7/2021	\$350.00	10.1	\$3,535.00	FINALIZE MEET AND CONFER SUMMARY; DRAFT PROPOSED SEARCH TERMS; CASE LAW RESEARCH RE POSSIBLE DISCOVERY MOTION TO COMPEL
10/8/2021	\$350.00	4.9	\$1,715.00	DRAFT, PROOF, EDIT LETTER TO MAGISTRATE JUDGE
10/11/2021	\$350.00	0.3	\$105.00	PREPARE AND SEND COURTESY COPIES FOR MAGISTRATE JUDGE
10/19/2021	\$350.00	11.7	\$4,095.00	DRAFT, PROOF, EDIT DISCOVERY LETTER FOR MAGISTRATE JUDGE
10/20/2021	\$350.00	4.9	\$1,715.00	DRAFT, PROOF, EDIT LETTER FOR MAGISTRATE JUDGE
11/4/2021	\$350.00	5.1	\$1,785.00	ATTEND CONFERENCE WITH MAGISTRATE MOSES; DRAFT REVISED ESI PROTOCOL BASED ON JUDGE MOSES' DIRECTION
1/5/2022	\$350.00	1.6	\$560.00	DRAFT CHEEKS LETTER IN SUPPORT OF JUDICIAL APPROVAL OF SETTLEMENTS
1/6/2022	\$350.00	1.2	\$420.00	DRAFT CHEEKS LETTER; FINALIZE; PROOF; REVIEW
1/6/2022	\$350.00	3.4	\$1,190.00	DRAFT CHEEKS LETTER IN SUPPORT OF JUDICIAL APPROVAL OF SETTLEMENTS
1/7/2022	\$350.00	4.9	\$1,715.00	DRAFT CHEEKS LETTER FOR JUDICIAL APPROVAL OF SETTLEMENTS
1/20/2022	\$350.00	1.3	\$455.00	CASE LAW RESEARCH RE CHEEKS JUDICIAL APPROVAL OF SETTLEMENTS
1/20/2022	\$350.00	0.5	\$175.00	TEAM CALL RE OUTSTANDING CLIENTS
1/20/2022	\$350.00	0.6	\$210.00	COORDINATE WITH OPPOSING COUNSEL RE CHEEKS LETTER FOR SETTLEMENT APPROVAL
1/21/2022	\$350.00	0.5	\$175.00	CASE LAW RESEARCH IN SUPPORT OF CHEEKS LETTER FOR JUDICIAL APPROVAL OF SETTLEMENT

HENAO V. PARTS AUTHORITY**FBFG TIME ENTRIES**

Joshua Cottle, Associate, University of Minnesota Law	9/21/2021	\$250.00	1.5	\$375.00	WRITTEN OFF AS BILLING JUDGMENT
Amir A-Ali, Paralegal	7/21/2021	\$160.00	1	\$160.00	REVIEWED AND DRAFTED CONFERRAL SUMMARY
	8/30/2021	\$160.00	0.5	\$80.00	DRAFT NOTICE OF APPEARANCE FOR A. CHAN
	10/14/2021	\$160.00	3	\$480.00	REVIEW AND REVISE LETTER MOTION FOR CONFERENCE; SEARCH FOR DEFENDANTS PRODUCTION ON ONEDRIVE AND SPRING CM; TAB ALL EXHIBITS; COMPILE EXHIBITS; FILE LETTER MOTION AND EXHIBITS IN SDNY
	10/15/2021	\$160.00	1	\$160.00	WRITTEN OFF AS BILLING JUDGMENT
	10/19/2021	\$160.00	1	\$160.00	FILED LETTER PAGE EXTENSION REQUEST ON ECF; CALLED ECF HELP DESK TO REVISE FILING.
	11/9/2021	\$160.00	0.5	\$80.00	SENT FOLLOW UP EMAILS TO TEAM TO REMIND EVERYONE OF FILING DEADLINE;
	11/10/2021	\$160.00	0.5	\$80.00	REVIEWED AND FILED JOINT STATUS LETTER
	11/17/2021	\$160.00	0.5	\$80.00	DRAFTED LETTER TO JUDGE; FILED LETTER
	12/2/2021	\$160.00	0.5	\$80.00	CALLED JUDGE'S CLERK TO FOLLOW UP ON LETTER REQUEST; CIRCULATED DOCKET UPDATE; UPDATED CALENDAR
	12/8/2021	\$160.00	0.2	\$32.00	WRITTEN OFF AS BILLING JUDGMENT
	1/5/2022	\$160.00	0.2	\$32.00	FILED CHEEKS LETTER
	1/6/2022	\$160.00	1	\$160.00	CREATED SETTLEMENT CHART FOR A. CHAN
	1/7/2022	\$160.00	1.5	\$240.00	WORKED ON TIME SPREADSHEET
	3/3/2022	\$160.00	1	\$160.00	PREPARED EXHIBITS FOR FILING; FILED CHEEKS LETTER
Evelyn Ozuna, Paralegal	10/30/2019	\$190.00	5.5	\$1,045.00	MADE CALLS AND FOLLOW UP CALL TO CLIENT TO RETRIEVE MORE INFORMATION
Jared Benn, Paralegal	10/16/2020	\$150.00	2	\$300.00	PREPARED AND FILED DOCUMENTS
	10/16/2020	\$150.00	3.35	\$502.50	RE- COUNTED NUMBER OF ARB AGREEMENTS WE DID AND DID NOT GET IN PARTS CASES
	10/19/2020	\$150.00	0.5	\$75.00	COLLECTED ADDITIONAL INFORMATION THAT WE HAVE ABOUT CLIENTS
	10/23/2020	\$150.00	1	\$150.00	DOWNLOADED AND UPLOADED DOCUMENTS TO THE SYSTEM
	10/23/2020	\$150.00	0.5	\$75.00	SKIP TRACED DOCUMENT
	10/23/2020	\$150.00	3	\$450.00	SPOKE TO CLIENTS AND HAD THEM DOCUSIGN OPT IN FORMS
	10/28/2020	\$150.00	0.5	\$75.00	CALLED AND SPOKE TO CLIENTS ABOUT THEIR CONCERNS WITH THE CASE
	10/28/2020	\$150.00	3	\$450.00	TRACKED DOWN AND HAD CLIENTS SIGN OPT IN FORMS
	10/29/2020	\$150.00	5	\$750.00	TRACKED DOWN CLIENTS AND HAD CLIENTS SIGN OPT IN FORMS
	10/30/2020	\$150.00	2	\$300.00	PREPARED EXHIBITS AND THEN FILED OPT IN FORMS
	10/30/2020	\$150.00	2	\$300.00	FILED COMPLAINT
	1/12/2021	\$150.00	0.5	\$75.00	UPDATED CALENDAR TO REFLECT DUE DATES ON THE DOCKET
	2/8/2021	\$150.00	0.3	\$45.00	WRITTEN OFF AS BILLING JUDGMENT
	2/19/2021	\$150.00	0.5	\$75.00	WRITTEN OFF AS BILLING JUDGMENT
	10/6/2021	\$150.00	2	\$300.00	WRITTEN OFF AS BILLING JUDGMENT
	12/1/2021	\$150.00	0.5	\$75.00	SAVED DOCUMENTS TO OUR FILES
	12/1/2021	\$150.00	2	\$300.00	PREPARED DOCUMENTS AND THEN FILED

HENAO V. PARTS AUTHORITY

FBFG TIME ENTRIES

Total	\$461,118.50
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